



December 9, 2005

Mr. Nabil S. Fayoumi
U. S. EPA - Region 5
77 West Jackson Boulevard (SR-6J)
Chicago, Illinois 60604-3590

Re: Sauget Area 2 Site – October 3, 2002 Unilateral Administrative Order (UAO) Groundwater Operable Unit Monthly Report; November 1 - November 30, 2005 Reporting Period

Dear Nabil:

Attached is the Monthly Report for the Sauget Area 2 Site October 3, 2002 Unilateral Administrative Order (UAO) - Groundwater Operable Unit. This submittal is in fulfillment of the monthly reporting requirements of the UAO, Section XII, paragraph 62, <u>Progress Reports</u>. This report is for the period November 1 – November 30, 2005.

Sincerely,

Steven D. Smith Project Coordinator

cc:

Ken Bardo, - U. S. EPA

Mayor Sauget - Sauget, IL

Sandra Bron – IEPA

Mike Coffey - USFWS

Village of Sauget – c/o P. H. Weis & Associates (Attn: Brian Nelson)

Mayor Frank Bergman – Cahokia

L. Glen Kurowski - Monsanto

Cathleen Bumb - Solutia

Linda Tape - Husch & Eppenberger

Richard Williams - Solutia

Sauget Area 2 Site - Sauget, Illinois

October 3, 2002 UAO – Groundwater Operable Unit

Status Report

Date of Report:

December 10, 2005

Period Covered:

November 1 - November 30, 2005

Work Performed During the Reporting Period

General Site Work

- The Pre-Final Inspection was conducted on June 28, 2005. The only item that was identified as requiring completion before the Final Inspection was a pressure test on the discharge pipeline. That test was successfully completed on July 14th. On July 19th, the Agency was requested by e-mail to complete a Final Inspection and issue a Construction Complete notice. The Agency responded on August 30th requesting the submission of a Technical Memorandum comparing the historical groundwater discharges at the P-Chem Plant with the flow rates from the individual extraction wells. The comparison was intended to be used to determine the appropriate percentage flow difference that should trigger an alarm signaling a problem with the GMCS during system operation. That comparison was submitted on September 12th.
- Comments on the Operations and Maintenance Plan that was submitted to the Agency on June 21, 2005 were received on September 20th. Those comments are being reviewed and responses will be prepared and submitted.

Groundwater Treatment

- The second Interim Operating Period began on August 1,, 2005 and continued through October 31st. For the entire month of November, the system was operated to maintain the total pumping rate equal to the computed inflow rate, based on the average of the gradients measured in four pairs of piezometers placed immediately upgradient of the Site R landfill.
- During the first three days of the reporting period, well EW-1 was shut down while the pitless adapter was being replaced. Wells EW-2 and EW-3 pumped equal volumes of groundwater during this period. The well as restarted on November 4th and well EW-3 was shut down for approximately 3 hours while the

pump was replaced as part of the routine maintenance activities. On November 5th, well EW-2 was shut down and the system was programmed so that the other two wells pumped at the same flow rate and this condition was essentially maintained for the rest of the month, with a few minor exceptions associated with maintenance and servicing of the system..

- All of the extraction well pumps were replaced between November 1st and November 4th, as were all of the pitless adapters..
- Because of frequent tripping of the circuit breaker on well EW-1, the power supply to this well was monitored. Several low voltage spikes were detected in the supply, but no overvoltage spikes sufficient to trip the breaker were noted. The power line was checked for continuity and this suggested that the line was grounding to earth under some conditions. Consequently, the supply line was replaced between October 31st and November 3rd..
- The results for the first quarter groundwater samples of the performance monitoring wells are being validated. However, the unvalidated results were submitted to the Agency on October 27th. The second quarter groundwater samples, as well as the first semiannual sediment and surface water samples, were being analyzed during the reporting period.
- Water level and pumping data for the month of October are attached.

Schedule

The Agency is currently reviewing various submissions to determine if construction is complete.

Submittals During Reporting Period

There were no submittals during the reporting period.

Work Scheduled for Next Reporting Period

- Continue pumping and treating groundwater using the new control program.
- Prepare a report summarizing the results of the Second Interim Operating Period and providing recommendations for the operation of the control system.
- Complete validation of the results of the first quarter groundwater samples from the performance monitoring wells.
- Complete the analyses of the second quarter groundwater samples from the performance monitoring wells and the first semiannual sediment and surface water samples and begin validating these results.
- Obtain third quarter groundwater samples from the performance monitoring wells.

PUMPING DATA

	PUMPING RATE						GROUNDWATER LEVELS								
		Computed													
Date/Time		Q	Total Q	EW-1 Q	EW-2 Q	EW-3 Q	SWL	PZ-5U	PZ-5D	Delta	PZ-6U	PZ-6D	Delta	PZ-7U	PZ-7D
11/1/2005	Daily Average	705.42	706.06	0.10	352.89	353.07	380.43	386.77	385.99	-0.78	386.63	386.57	-0.07	386.67	386.04
11/2/2005	Daily Average	704.31	701.92	0.00	350.94	350.98	380.47	386.73	385.98	-0.75	386.56	386.48	-0.08	386.62	385.99
11/3/2005	Daily Average	744.27	607.36	0.00	307.31	300.05	379.50	386.67	385.86	-0.82	386.54	386.42	-0.12	386.59	385.99
11/4/2005	Daily Average	791.31	759.66	106.60	314.19	338.87	378.93	386.50	385.64	-0.86	386.37	386.24	-0.12	386.45	385.82
11/5/2005	Daily Average	801.41	801.92	400.94	0.00	400.98	379.20	386.29	385.42	-0.87	386.20	386.03	-0.16	386.36	385.73
11/6/2005	Daily Average	825.94	826.50	413.23	0.00	413.27	379.26	386.11	385.20	-0.91	385.99	385.81	-0.17	386.17	385.53
11/7/2005	Daily Average	779.39	724.35	361.47	0.00	362.88	379.26	386.05	385.21	-0.84	385.97	385.84	-0.13	386.16	385.53
11/8/2005	Daily Average	788.15	788.88	394.44	0.00	394.44	379.28	385.97	385.12	-0.85	385.90	385.74	-0.16	386.09	385.46
11/9/2005	Daily Average	803.38	812.99	339.46	134.03	339.50	379.33	385.87	385.02	-0.84	385.77	385.61	-0.16	385.97	385.33
11/10/2005	Daily Average	793.75	795.24	265.11	265.07	265.06	379.53	385.85	385.01	-0.84	385.72	385.57	-0.15	385.93	385.27
11/11/2005	Daily Average	788.52	786.09	316.76	152.48	316.85	378.98	385.79	384.91	-0.89	385.65	385.51	-0.14	385.87	385.24
11/12/2005	Daily Average	810.20	809.29	404.63	0.00	404.66	378.27	385.62	384.71	-0.91	385.54	385.39	-0.15	385.75	385.12
11/13/2005	Daily Average	869.73	867.73	433.86	0.00	433.87	377.76	385.43	384.46	-0.97	385.35	385.16	-0.19	385.55	384.88
11/14/2005	Daily Average	854.05	845.64	418.27	0.94	426.43	377.58	385.42	384.45	-0.96	385.34	385.16	-0.18	385.55	384.90
11/15/2005		811.13	812.29	406.14	0.00	406.15	378.26	385.34	384.40	-0.94	385.29	385.23	-0.06	385.50	384.86
11/16/2005		783.77	784.49	392.25	0.00	392.24	379.61	385.25	384.41	-0.84	385.15	385.00	-0.14	385.33	384.68
11/17/2005	, , ,	794.63	792.58	396.29	0.00	396.30	378.52	385.17	384.31	-0.86	385.11	384.94	-0.17	385.31	384.67
11/18/2005	, , ,	812.67	815.07	407.56	0.00	407.51	378.21	385.14	384.23	-0.91	385.07	384.90	-0.16	385.27	384.65
11/19/2005		791.05	789.36	394.66	0.00	394.70	378.82	385.14	384.27	-0.86	385.04	384.89	-0.15	385.25	384.62
11/20/2005		842.50	842.98	421.43	0.12	421.43	378.52	385.05	384.16	-0.89	384.96	384.78	-0.18	385.17	384.48
11/21/2005	, , ,	756.58	758.16	379.08	0.00	379.08	379.02	385.05	384.23	-0.82	384.95	384.83	-0.12	385.16	384.54
11/22/2005	, , ,	737.63	737.55	368.78	0.00	368.78	379.38	385.07	384.24	-0.83	384.95	384.80	-0.15	385.12	384.54
11/23/2005	, , ,	735.24	734.28	367.15	0.00	367.13	379.36	385.15	384.35	-0.80	385.01	384.88	-0.13	385.22	384.62
11/24/2005	, ,	762.50	764.65	381.81	1.02	381.82	379.28	384.94	384.15	-0.79	384.82	384.68	-0.14	385.02	384.38
11/25/2005		739.89	738.66	369.33	0.00	369.33	378.75	384.92	384.13	-0.79	384.80	384.68	-0.11	385.01	384.39
11/26/2005	, , ,	780.13	781.60	390.02	1.53	390.05	378.12	384.87	384.02	-0.85	384.78	384.64	-0.14	384.98	384.36
11/27/2005	, , ,	770.09	773.03	386.49	0.00	386.54	378.49	384.89	384.04	-0.85	384.77	384.66	-0.11	384.99	384.37
11/28/2005	, , ,	564.66	575.71	293.87	0.00	294.09	380.79	384.97	384.29	-0.68	384.89	384.95	0.05	385.04	384.46
11/29/2005		605.65	604.00	206.13	95.56	302.32	380.97	384.98	. 384.34	-0.64	384.82	384.73	-0.09	384.92	384.34
11/30/2005	Daily Average	644.96	642.78	301.73	19.36	321.69	379.77	384.92	384.23	-0.68	384.78	384.65	-0.13	384.93	384.35

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						PZ-	PZ-			PZ-		PŻ-	
						1_OUTSI	PZ-	2_OUTSI	PZ-	3_OUTSI	PZ-	4_OUTSI	PZ-
Date/Time		Delta	PZ-8U	PZ-8D	Delta	DE	1_INSIDE	DE	2_INSIDE	DE	3_INSIDE	DE	4_INSIDE
11/1/2005	Daily Average	-0.63	386.36	385.15	-1.21	382.54	385.61	379.58	385.38	380.57	384.01	382.34	383.86
11/2/2005	Daily Average	-0.63	386.33	385.14	-1.19	382.59	385.57	379.73	385.34	380.50	383.98	382.41	383.83
11/3/2005	Daily Average	-0.60	386.29	385.00	-1.30	382.12	385.60	378.90	385.40	379.73	384.22	382.01	384.00
11/4/2005	Daily Average	-0.64	386.13	384.74	-1.40	381.71	384.99	378.31	384.95	379.15	383.88	381.59	383.69
11/5/2005	Daily Average	-0.64	386.03	384.66	-1.37	381.77	383.63	378.54	384.54	379.37	384.21	381.63	383.54
11/6/2005	Daily Average	-0.64	385.84	384.43	-1.41	381.63	383.24	378.53	384.24	379.33	383.92	381.47	383.23
11/7/2005	Daily Average	-0.63	385.85	384.49	-1.36	381.65	383.51	378.59	384.41	379.41	384.13	381.55	383.47
11/8/2005	Daily Average	-0.63	385.77	384.43	-1.35	381.61	383.30	378.60	384.26	379.41	384.02	381.49	383.33
11/9/2005	Daily Average	-0.64	385.68	384.28	-1.40	381.46	383.27	378.58	384.04	379.37	383.69	381.42	383.25
11/10/2005	Daily Average	-0.66	385.66	384.31	-1.35	381.29	383.45	378.79	383.91	379.59	383.52	381.54	383.36
11/11/2005	Daily Average	-0.63	385.61	384.27	-1.35	381.36	383.32	378.33	383.97	379.15	383.66	381.32	383.29
11/12/2005	Daily Average	-0.63	385.43	384.02	-1.41	380.93	382.90	377.64	383.88	378.48	383.64	380.88	382.96
11/13/2005	Daily Average	-0.66	385.20	383.71	-1.49	380.52	382.42	377.12	383.53	377.95	383.26	380.46	382.51
11/14/2005	Daily Average	-0.65	385.19	383.72	-1.47	380.48	382.57	377.03	383.62	377.89	383.35	380.46	382.60
11/15/2005	Daily Average	-0.64	385.16	383.67	-1.49	380.65	382.57	377.49	383.60	378.30	383.36	380.59	382.63
11/16/2005	Daily Average	-0.64	385.04	383.71	-1.33	381.27	382.38	378.75	383.41	379.48	383.12	381.14	382.45
11/17/2005	Daily Average	-0.63	385.01	383.66	-1.35	380.83	382.38	377.89	383.42	378.68	383.18	380.77	382.48
11/18/2005	Daily Average	-0.63	384.96	383.56	-1.41	380.60	382.37	377.50	383.39	378.31	383.18	380.53	382.46
11/19/2005	Daily Average	-0.63	384.94	383.58	-1.36	380.87	382.40	378.09	383.39	378.87	383.18	380.80	382.47
11/20/2005	Daily Average	-0.69	384.84	383.43	-1.41	380.68	382.15	377.80	383.19	378.47	382.97	380.59	382.20
11/21/2005	Daily Average	-0.61	384.88	383.56	-1.32	380.95	382.37	378.25	383.37	379.09	383.19	380.84	382.42
11/22/2005	Daily Average	-0.58	384.85	383.61	-1.24	381.11	382.40	378.59	383.36	379.34	383.12	381.02	382.42
11/23/2005	Daily Average	-0.61	384.96	383.70	-1.26	381.17	382.58	378.65	383.52	379.40	383.32	381.11	382.62
11/24/2005	Daily Average	-0.64	384.75	383.46	-1.29	380.97	382.14	378.45	383.16	379.17	382.88	380.87	382.20
11/25/2005	Daily Average	-0.61	384.75	383.46	-1.29	380.76	382.27	378.05	383.25	378.82	382.99	380.73	382.29
11/26/2005	Daily Average	-0.62	384.69	383.34	-1.36	380.41	382.19	377.46	383.18	378.22	382.97	380.40	382.25
11/27/2005	Daily Average	-0.62	384.70	383.34	-1.36	380.58	382.23	377.75	383.21	378.48	383.00	380.51	382.26
11/28/2005	Daily Average	-0.58	384.78	383.98	-0.79	381.65	382.70	379.72	383.52	380.40	383.26	381.48	382.61
11/29/2005	Daily Average	-0.58	384.72	383.77	-0.95	381.84	382.93	380.04	383.46	380.70	382.93	381.70	
11/30/2005	Daily Average	-0.59	384.70	383.71	-0.99	381.28	382.65	379.00	383.39	379.72	383.08	381.24	382.44